



Joseph M. Marrone, Esquire | Christopher M. Marrone, Esquire | Brian M. Marchese, Esquire

Admitted in PA, NJ & NY

Admitted in PA & NJ
(Of Counsel)

Admitted in PA & NJ

July 8, 2022

Via ECF

Honorable Chad F. Kenney
United States District Court for the
Eastern District of Pennsylvania
11613 U.S. Courthouse
601 Market Street
Philadelphia, PA 19106

Re: Westrick v. Temple University, et al.
Docket No.: 22-cv-01606

Dear Judge Kenney:

Pursuant to the Court's Order of June 27, 2022, counsel for the parties have conferred regarding Rule 12 Motions and a potential resolution of this pending litigation.

The parties have secured the services of Judge Annette M. Rizzo (retired) to serve as the neutral for a July 19, 2022, mediation conducted through JAMS alternative dispute resolution services. That date is confirmed, and the parties have expressed a mutual interest in reaching an amicable resolution.

In order to give that mediation the best chance of success without the parties expending potentially unnecessary time and expense, the parties jointly propose the following schedule with related modifications to the Court's June 27, 2022 Order:

- Mediation to occur on July 19, 2022;
- Within seven (7) days following the mediation (July 26, 2022), the parties will advise the Court if the matter is resolved;
- If the case is not resolved by July 26, 2022, the Plaintiff is to file any Amended Complaint on or before August 2, 2022;
- Defendants to file Rule 12 motion within 30 days following the filing of an Amended Complaint.

- In the event that the Plaintiff does not file an Amended Complaint on or before August 2, 2022, Defendants shall file a Motion to Dismiss or otherwise reply to the Complaint on or before August 16, 2022.

200 South Broad Street • Suite 400 • Philadelphia, PA 19102

T: 215-732-6700 • F: 215-732-7660

Offices in Pennsylvania • New Jersey • New York

marronelaw.com

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We look forward to hearing from the Court regarding this joint proposal. Please let us know if any further information, or a formal motion, is required at this time. We thank the Court for its kind consideration of this joint proposal.

Respectfully submitted,

Michael Pomerantz
Michael D. Pomerantz

cc: James Keller, Esquire